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Via ECF

April 21, 2015

The Honorable Leonard D. Wexler
United States District Court
Eastern District of New York
944 Federal Plaza
Central Islip, New York 11722

Re: *Montenegro, et al v. XpresSpa at Term. 4 JFK LLC, et al*
Docket No. 15-cv-2057

Dear Judge Wexler,

I am counsel on this case and write to respectfully request that this case be transferred to the Eastern District Court residing in Brooklyn as a related case to another matter. Moreover, this case was designated to this Courthouse because I had erroneously stated that "the events giving rise to the claims occurred in Nassau or Suffolk County."

In fact, all of the events occurred in Queens county and this case would be more efficiently adjudicated in the Courthouse located in Brooklyn. It would be a hardship for the Plaintiffs to travel to Central Islip and also, the individual defendants live in Manhattan and maintain headquarters in Manhattan. Plaintiffs live and worked at locations in Queens county, where the events giving rise to the claims arose.

I apologize for any inconvenience caused to the Court by my own oversight.

Moreover, this case is a related action to the one already on file in Brooklyn under Docket Number 15-cv-1347 (the "Brooklyn Case"). The Brooklyn Case was brought against the same defendants and relate to similar wage and hour claims. Moreover, there have been at least two other prior cases (09-cv-1730 and 10-cv-3473) which have since been adjudicated, all of which were filed in the Eastern District Court located in Brooklyn because the claims arose in Queens, as with this current case.

In summary, we respectfully request that the Court transfer this case to the Eastern District Court located in Brooklyn and be designated as a related case to 15-cv-1347.

Respectfully submitted,

/s/ C.K. Lee
C.K. Lee

cc: All parties and Magistrate Judge Anne Y. Shields via ECF
Chief Judge Carol Bagley Amon and Magistrate Judge Cheryl L. Pollak via First Class Mail